

**IN THE DRAWINGS:**

Please replace Sheet 2 presently on file with attached Replacement Sheet 2 that includes changes to Figure 2. In Figure 2, additional terminal sets have been denoted.

Attachment: Replacement Sheet 2

### **REMARKS/ARGUMENTS**

The Applicants originally submitted Claims 1-26 in the application. In response to an election requirement, the Applicants provisionally selected Claims 1-7 without traverse and withdrew Claims 8-26. In previous responses, the Applicants amended Claims 1-3 and canceled dependent Claim 3 without prejudice or disclaimer.

In the present response, the Applicants submit Replacement Sheet 2 with changes to Figure 2 and amend independent Claim 1. Support for the amendment can be found in paragraphs 7, 22, 26, 36 and Figures 1-2 of the original specification. No other claims have been amended, canceled or added. Accordingly, Claims 1-2 and 4-7 are currently pending in the application.

#### **I. Formal Matters and Objections**

The Examiner has objected to the drawings for not specifically pointing out what is claimed. In response, the Applicants have amended independent Claim 1 and Figure 2 to clearly illustrate other terminal sets in addition to the representative terminal set noted in the original drawing. The Applicants point out that the terminal sets are configured to provide terminating points for components (*e.g.*, represented by the inputs for the various terminal sets such as the high pressure switch input, discharge thermostat input, *etc.*) during normal operation thereof. Accordingly, the centralized connector module 200 is a common location to terminate each component. Thus, amended Figure 2 illustrates a centralized connector module including interconnected terminal sets corresponding to components connectable thereacross and configured to provide terminating points for the components during normal operation thereof as recited in

amended independent Claim 1. Accordingly, the Applicants respectfully request the Examiner to withdraw the objection of the drawings.

## **II. Rejection of Claims 1 and 7 under 35 U.S.C. §102**

The Examiner has rejected Claims 1 and 7 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,124,716 to Kanamori. The Applicants respectfully disagree.

Kanamori discloses an electrical junction block 10 having a pair of ports to receive a wiring harness connector 18 and a test unit connector 20. (*See* column 2, line 66 to column 3, line 3.) The test unit connector 20 includes a body 34 from which a plurality of terminal pins 36 extends. The terminal pins 36 are electrically connected to wires 38 extending to a test unit 26. (*See* column 3, lines 33-35.)

The Examiner asserts that when the test unit 26 is connected to the junction block 10, then the test unit connector 20, the wires 38, the test unit 26 and the junction block 10 can be broadly considered as a connector module. (*See* Examiner's Action, page 3.) These connected components, however, is not a "self contained assembly of electronic components and circuitry installed as a unit" as asserted by the Examiner. (*See* the definition for a module provided by the Examiner on page 3 of the Examiner's Action.) On the contrary, the test unit connector 20, the test unit 26 and the junction block 10 can each be considered modules independent of the other components. In other words, the above-connected list of components is a combination of modules, not a single module. Additionally, the test unit connector 20, the wires 38, the test unit 26 and the junction block 10 are not installed as a unit. This is evident since the test unit connector 20 and the test unit 26 are connected to the junction block 10 when testing is performed. (*See* column 3, line 55, to column 4, line 21.)

The Examiner also asserts that the body of the test unit connector 20 is a dielectric body as recited in independent Claim 1. (*See* Examiner's Action, page 4.) The test unit connector 20, however, or more specifically, the body of the test unit connector 20 does not have interconnected terminal sets that provide a common terminating point for components during normal operation thereof as recited in independent Claim 1. On the contrary, the test unit connector 20 has the terminal pins 36 which are individual protrusions that provide a connection during testing between the test unit 26 and the electrical devices 24 that are operatively connected to the junction block 10 via the wiring harness connector 18. (*See* column 3, lines 48-61; column 4, lines 11-16 and Figures 1-2.) The terminal pins 36 do not provide a termination for the electrical devices 24 connected to the wiring harness 18. Instead, these electrical devices 24 are terminated at the wiring harness 18. (*See* column 3, lines 3-5.) As such, the body of the test unit connector 20 does not have interconnected terminal sets configured to provide a common terminating point for the components during normal operation thereof as recited in independent Claim 1.

Furthermore, the body of the test unit connector 20 does not include continuity indicator circuits integrated within. On the contrary, the test unit connector 20 simply provides an electrical connection between the test unit 26 and the devices 24 via the wiring harness 18. Continuity testing is can then be performed by the test unit 26, a completely separate module from the test unit connector 20. (*See* column 4, lines 11-16, and Figure 1.) Thus, the body of the test unit connector 20 also does not have continuity indicator circuits integrated within as recited in amended independent Claim 1.

Since Kanamori does not teach each and every element of amended independent Claim 1, Kanamori does not anticipate Claim 1 and Claims dependent thereon. Accordingly, the Applicants

respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1 and 7 and allow issuance thereof.

### **III. Rejection of Claims 2, 4 and 6 under 35 U.S.C. §103**

The Examiner has rejected Claims 2, 4 and 6 under 35 U.S.C. §103(a) as being unpatentable over Kanamori in view of U.S. Patent No. 3,728,616 to Cheek, *et al.* The Applicants respectfully disagree.

As discussed above, Kanamori does not teach a centralized connector module as recited in amended independent Claim 1. Additionally, Kanamori does not suggest each element of amended independent Claim 1 since Kanamori discloses a separate module, the test unit 26, that is used to provide continuity checks. (*See* column 4, lines 11-16, and Figure 1.) Accordingly, Kanamori does not teach or suggest each element of independent Claim 1.

Cheek has not been cited to cure the deficiencies of Kanamori but to teach the subject matter of dependent Claims 2, 4 and 6. Additionally, Cheek does not cure the deficiencies of Kanamori since Cheek teaches an apparatus for testing the continuity and erroneous connections of a plurality of wired connections. (*See* column 1, lines 30-32.) Thus, instead of disclosing a central connector module including continuity circuits, Cheek teaches a separate device that is used to check continuity of circuits. Cheek, therefore, does not cure the deficiencies of Kanamori.

As such, Kanamori and Cheek, individually or in combination, does not teach or suggest each and every element of independent Claim 1 and Claims dependent thereon. Thus, the cited combination of Kanamori and Cheek does not provide a *prima facie* case of obviousness of independent Claim 1 and Claims 2, 4 and 6 which depend thereon. The cited combination,

therefore, does not render obvious Claims 2, 4 and 6. Accordingly, the Applicants respectfully request the Examiner to withdraw §103(a) rejection of Claims 2, 4 and 6 and allow issuance thereof.

#### **IV. Rejection of Claim 5 under 35 U.S.C. §103**

The Examiner has rejected Claim 5 under 35 U.S.C. §103(a) as being unpatentable over Kanamori in view of U.S. Patent No. 6,323,652 to Collier, *et al.* The Applicants respectfully disagree.

As discussed above, Kanamori does not teach or suggest a centralized connector module as recited in amended independent Claim 1. Collier discloses an electrical testing device for determining the continuity between ground terminals of an electrical power cord and determining the electrical grounding of an electrical power tool. (*See Abstract.*) Collier has not been cited to cure the deficiencies of Kanamori but to teach the subject matter of dependent Claim 5. (*See Examiner's Action, page 6.*) As such, the cited combination of Kanamori and Collier does not provide a *prima facie* case of obviousness of amended independent Claim 1 and Claim 5 which depends thereon. Accordingly, the Applicants respectfully request the Examiner to withdraw the §103(a) rejection of Claim 5 and allow issuance thereof.

**V. Conclusion**

In view of the foregoing amendment and remarks, the Applicant now sees all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicits a Notice of Allowance for Claims 1-2 and 4-7.

The Applicant requests the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

HITT GAINES, PC

A handwritten signature in cursive script, appearing to read "J. Joel Justiss".

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